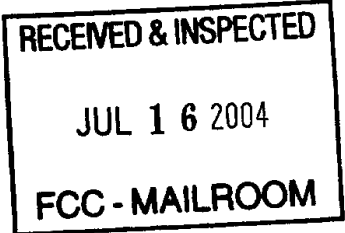


Before the
Federal Communications Commission
Washington, D.C. 20554



In the Matter of:)
)
Amendment of Section 73.202(b),) MB Docket No. 04-219
FM Table of Allotments, FM Broadcast Stations) RM-10986
(Evergreen, Alabama and Shalimar, Florida))

TO: Audio Division

COMMENTS OF GULF COAST BROADCASTING COMPANY, INC.

Gulf Coast Broadcasting Company, Inc., by its attorney, hereby submits the following Comments in support of the Rulemaking proposed in this proceeding.

I. Gulf Coast Broadcasting Company, Inc. and Its Interest in This Proceeding

1. Gulf Coast Broadcasting Company, Inc. (hereinafter "GCBC") is the licensee of FM Broadcast Station WPGG, Evergreen, Alabama. This proceeding was initiated by GCBC. GCBC seeks to amend the Table of FM Allotments by downgrading Channel 227C1 to Channel 227C2, and re-allotting the channel from Evergreen, Alabama to Shalimar, Florida, thus providing Shalimar with its first local transmission service. Additionally, GCBC has requested that an Order be issued, requiring GCBC to show cause why its license for Station WPGG should not be modified to specify operation at Shalimar instead of Evergreen.

2. GCBC hereby reaffirms its expression of interest in this proceeding, and reaffirms that, if the license of Station WPGG is modified as requested, GCBC will promptly construct the new facilities at Shalimar, Florida and place those facilities in operation, in the public interest. The Notice of Proposed Rulemaking also requires

GCBC to submit a Tuck showing, *i.e.*, a showing that Shalimar has needs separate and apart from those in Fort Walton Beach urbanized area. That matter is addressed in the next section of these Comments.

II. Shalimar is Independent of the Fort Walton Beach Urbanized Area

3. In *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*"), the Commission set forth eight factors in assessing the independence of a specified community: (1) the extent to which the community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's needs and interests; (3) whether the community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local phone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies upon the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries. The FCC has considered a community as independent when a majority of these factors demonstrate that the community is distinct from the urbanized area. *Parker and St. Joe, Florida*, 11 FCC Rcd 1095 (1996); *Jupiter and Hobe Sound, Florida*, 12 FCC Rcd 3570 (1997).

4. Victor A. Bosiger, GCBC's consulting engineer, has made a study of the community of Shalimar, in light of the eight factors discussed in *Tuck*. Mr. Bosiger's

study is attached and marked Exhibit 1. Additionally, there is attached and marked as Exhibit A to Mr. Bosiger's study, a statement from the Town Manager of Shalimar, Thomas Burns. In the following discussion, we will refer to Exhibits 1 and/or A as the source for the factual statements made.

A. Shalimar is a Net Importer of Jobs; More People Come to Work in Shalimar From Other Parts of the Urbanized Area Than Leave Shalimar to Go to Work in These Other Parts.

5. There are approximately 50 commercial and governmental establishments in Shalimar. *See*, Exhibit 1, p. 1. These establishments provide employment to a large number of people, so that Shalimar is a net importer, rather than an exporter of jobs. In fact, the daytime population of Shalimar has been estimated at 1,100. *See*, Exhibit 1, p. 1.

6. Many of the residents of Shalimar are retired, and simply remain in their homes and do not go to work at all. Other residents have ties to the military, and work in or at the nearby Eglin Air Force Base, parts of which are located in the Urbanized Area, while other parts are not. *See*, Exhibit 1, p. 1.

7. But, overall, more people come to work in Shalimar every day than leave Shalimar to work someplace else. Therefore, Shalimar is not a typical "bedroom" community. It has an identity of its own, and it has needs and interests entirely separate and apart from those of the Fort Walton Beach Urbanized Area. *See*, Exhibit A, para. 4.

B. Shalimar Has a Media Outlet That Covers the Communities Needs and Interests.

8. The town of Shalimar has its own website: www.shalimarflorida.org. Inspection of the website will show that it is very elaborate and includes extensive

information concerning community resources and events. Therefore, Shalimar definitely satisfies the requirements of the second factor in the *Tuck* analysis.

C. The Community Leaders and Residents of Shalimar Perceive Shalimar as Being Entirely Separate from the Fort Walton Beach Urbanized Area

9. The person most qualified to testify concerning the perceptions of the community leaders and residents of Shalimar is the Town Manager. He has sworn out a declaration, attached and marked Exhibit A, in which he affirms that, “. . . Shalimar residents have a strong sense of community identity. They know that they live in Shalimar; they do not think that they live in Fort Walton Beach or any other community.”

D. Shalimar Has Its Own Local Government and Elected Officials.

10. Shalimar has a mayor and four commissioners, who meet once a month throughout the year, governing the town. A planning and zoning board meets once a month, as well. The mayor is elected for a two-year term. Commissioners are elected for four-year terms, with two commissioners elected every other odd-numbered year. Candidates run at large in nonpartisan elections. Town Hall (2 Cherokee Avenue, Shalimar, Florida 32579, (850) 651-5723) is in what was a private residence when acquired in 1979. The building has since been renovated and enlarged.

11. Shalimar also has a Special Projects Commissioner, a Finance and Administration Commissioner, a Roads and Grounds Commissioner, a Town Attorney, a Town Manager, A Deputy Town Clerk, a Police Chief, and a Maintenance Supervisor. See, Exhibit 1, p. 2.

E. Shalimar Has Its Own Post Office and Zip Code.

12. Shalimar has its own post office and zip code, 32579. *See*, Exhibit 1, p. 2.

F. Shalimar Has Its Own Commercial Establishments, Health Facilities, and Transportation Systems.

13. Shalimar has a local commercial bus service, known as, "The Wave." It has a town doctor, Allan Fedosky, who operates a clinic under the name Access Medical Group. There are at least two dental offices in Shalimar. Shalimar has approximately fifty businesses and other establishments. These are described in Exhibit 1, p. 2 through 14.

G. Shalimar is a Separate Advertising Market from Fort Walton Beach.

14. Currently, there are no advertising media serving the special needs of Shalimar. The proposed station will, therefore, be a first advertising medium specifically serving the Shalimar market. As shown previously, there are at least fifty businesses and/or other establishments located within that market. *See*, Exhibit 1, p. 14 through 15.

H. Shalimar Has Its Own Municipal Services, Including a Police Department, Fire Station, Schools, and a Library.

15. Shalimar has its own police department, headed by Police Chief, Charles Self, and all Shalimar police officers are available, as needed. There are two schools situated within Shalimar, Clifford Meigs Middle School and Shalimar Elementary School. Shalimar has its own fire station. The independent Shalimar Library is located outside the town's boundaries. There are two town parks: Cherokee Park and Clifford Meigs Neighborhood Park. *See*, Exhibit 1, p. 1, 2, and 15.

III. Conclusion

16. Shalimar qualifies as independent under each one of the factors specified in *Tuck*. GCBC supplied the requisite expression of interest in support of the proposed rule change and modification of license. Therefore, the Table of FM Allotments should be amended, as proposed in this proceeding, and the license of Station WPGG(FM) should be modified to specify operations on Channel 227C2 at Shalimar, Florida.

July 15, 2004

Law Office of
LAUREN A. COLBY
10 E. Fourth Street
P.O. Box 113
Frederick, MD 21705-0113

Respectfully submitted,

GULF COAST BROADCASTING
COMPANY, INC.

By: _____


Lauren A. Colby
Its Attorney

EXHIBIT 1

STATE OF VIRGINIA
COUNTY OF CAMPBELL

DECLARATION

Victor C. Bosiger hereby declares under penalty of the laws of perjury that the following is true and correct:

I am the consulting engineer for Gulf Coast Broadcasting Company, Inc. I have conducted a study of the characteristics of the community of Shalimar, Florida, responsive to the Notice of Proposed Rulemaking issued by the Audio Division of the Federal Communications Commission ("FCC"), on June 10, 2004 in MM Docket No. 04-219. The results of my study are as follows:

1. The extent to which the community residents work in the larger metropolitan area, rather than the specified community:

Occupations, businesses and major employers

State Road 85, North Eglin Parkway, is the location of almost all the town's commercial and governmental establishments, estimated at 50 in number. The principal exception is the Shalimar Yacht Basin, which is on the bay at the town's southern end. The major employer is government. The local government includes the Shalimar Post Office (which gives the name Shalimar to an extensive unincorporated area to the north and east of the town), the Shalimar Courthouse Annex (which houses some of the county's offices as well as the courts), the Clifford Meigs Middle School, Shalimar Elementary School and a fire station. The Sheriff's office also occupies rental space in the recently built Executive Office Park. The daytime population has been estimated at 1,100, not counting the transients who use the post office, do business with the county offices and the courts, attend school, and eat at Giuseppi's Wharf Restaurant. Among other non-governmental businesses in the town are a large furniture store, three gas stations, a car wash, law offices, a gift shop, two "pubs," a travel agency, two used-car dealers, a couple of fast food establishments, a real estate company, a computer services business, and the branch offices of two banking companies. Many of the residents in Shalimar are retired.

Because of the proximity of the town to Eglin AFB, many residents have ties to the military. Some are military retirees; others are military or civilian employees of the base or employees of military contractors.¹ I have studied detailed maps and have concluded that parts of the base are located within the Urbanized Area, while other parts are not.

1 Information obtained from Shalimar Town website www.shalimarflorida.org

See exhibit A, Declaration of Thomas Burns, Shalimar Town Manager, regarding employment in Shalimar.

2. Whether the smaller community has its own newspaper or other media that covers the community's needs and interests:

The town of Shalimar has its own website: www.shalimarflorida.org

3. Whether the community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area;

See exhibit A, Declaration of Thomas Burns, Shalimar Town Manager, regarding perception of community leaders and residents.

4. Whether the specified community has its own local government and elected officials:

According to the Shalimar town website (www.shalimarflorida.org) a mayor and four commissioners; meet once a month throughout the year, governing the town. A Planning and Zoning Board meets once a month as well. The mayor is elected for a two-year term. Commissioners are elected for four-year terms, with two commissioners elected every other odd-numbered year. Candidates run at large in nonpartisan elections. Town Hall (2 Cherokee Avenue, Shalimar, Florida 32579, (850) 651-5723) is in what was a private residence when acquired in 1979. The building has since been renovated and enlarged.

Shalimar also has a Special Projects Commissioner, a Finance and Administration Commissioner, a Roads and Grounds Commissioner, a Town Attorney, a Town Manager, A Deputy Town Clerk, a Police Chief, and a Maintenance Supervisor.

5. Whether the smaller community has its own telephone book provided by the local phone company or zip code; *Shalimar has its own post office and zip code 32579*

6. Whether the community has its own commercial establishments, health facilities, and transportation systems;

The following information and list of businesses was obtained from the Shalimar town website (www.shalimarflorida.org)

The Wave is a local commercial bus service.

Access Medical Group is located within Shalimar. There are at least two dentist offices in Shalimar.

Partial list of businesses in Shalimar:

A & A Financial Group, Inc

20 Old Ferry Road. Our local telephone number is (850) 609-8081.

A-Travel Passport, INC

A Travel Passport, Inc., located at 1280 N Eglin Parkway, Shalimar, Florida was established in 1977 by Donald Thomas whom was a long time resident of Shalimar until his passing in 1996. Since his passing the business has continued to grow and prosper with the same dedication to not only the citizens of the Town of Shalimar, but the local Air Force Base community. We are an associate Travel office of the Carlson Wagonlit Travel headquarters in Minneapolis, Minnesota. We specialize in Cost Reimbursable Contractor Government Travel. We have a vacation department that is here to serve all with over 50 years of travel experience. Our local telephone number is (850) 651-3222, and our fax is (850) 651-2717. We welcome you to visit our web site or send us an email.

Access Medical Group (Allan Fedosky, M.D.)

Located at 100 Richbourg Ave, PO Box 128, Shalimar, Florida. Our telephone number is (850) 651-6301.

The Adoption Center (Photo)

The Adoption Center is open from 9AM to 5PM Monday through Friday; the office is closed for lunch between 12AM and 1:30PM. Our two experienced attorneys handle all types of adoptions--step-parent, grandparent, birth parent, relative, refinalizations of foreign adoptions and private (intermediary) adoptions. Hospital to home placement is offered with our infant placements. Attorney Rob Harrell is a member of the American Academy of Adoption Attorneys and a board member of the Florida Association of Adoption Attorneys. Attorney Alice Murray is board certified in appellate practice and has over ten years' experience in working with birth mothers. Located at 3 Clifford Drive, Shalimar, Florida. For more information, call us at (850) 651-5225, e-mail us, or visit our web site.

Alternative Funding

Located at 1270 N Eglin Parkway Suite 11-A, PO Box 932, Shalimar, Florida. Our local telephone number is (850) 609-1778.

American Insurance Center

Located at 1270 N Eglin Parkway PO Box 716, Shalimar, Florida. Our telephone number is (850) 651-0321.

American Realty of Northwest Florida

*ERA American Realty of Northwest Florida, Inc. is the largest company in closed transactions in Okaloosa, Santa Rosa and Walton Counties. In business for 20 years, the company has four offices, conveniently located for all types of real estate needs. Our 70+ experienced agents attend an extensive training course and continuing inhouse education, in order to offer sellers and buyers the highest level of expertise and professionalism available. Areas of expertise include: Residential * Commercial * Investments * Beach Homes * Property Management * Rental Department * Development * Military Relocation Specialists. We are located at 1270 N Eglin Parkway, Suite A Shalimar, Florida. Our telephone number is (850) 651-2454 or Toll Free (800) 372-0044, FAX (850) 651-5691. We welcome you to visit our web site or send us an email.*

AmSouth Bank

Located at 1248 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 833-8216.

AS Associates

Located at 5 Clifford Drive, Suite 6, Shalimar, Florida. Our telephone number is (850) 651-2854.

Attorney Cotton & Gates

Located at 3 Plew Ave, Shalimar, Florida. Our telephone number is (850) 651-9900.

Attorney Daniel C. Perri

Located at 5 Clifford Drive, Suite 12, Shalimar, Florida. Our telephone number is (850) 651-3011.

Attorney George I. Dewrell Sr

Located at 8 Clifford Drive, Shalimar, Florida. Our telephone number is (850) 651-4800.

Attorney Grinsted & Grinsted, P.A.

Located at 1117 N Eglin Parkway PO Box 915, Shalimar, Florida. Our telephone number is (850) 651-2014.

Attorney John C. Harrison

Located at 12 Old Ferry Road PO Box 876, Shalimar, Florida. Our telephone number is (850) 651-0354.

Attorney John R. Dowd

Located at 901 N Eglin Parkway PO Box 404, Shalimar, Florida. Our telephone number is (850) 651-1679.

Attorney Michael T. Webster, P.A.

Located at 12 Old Ferry Road PO Box 876, Shalimar, Florida. Our telephone number is (850) 651-0354.

Attorney Nickolas G. Petersen

Located at 12 Old Ferry Road PO Box 876, Shalimar, Florida. Our telephone number is (850) 651-0354.

Attorney Robison Harrell & Associates

Robinson R. Harrell & Associates is a private law firm which has been providing legal services in this area for over 24 years. Our office hours are from 9AM to 5PM Monday through Friday; the office is closed for lunch between 12AM and 1:30PM. Two experienced attorneys are available to assist with your legal needs. Mr. Harrell has been in practice for 30 years; he provides legal services in family law, probate, and general civil matters. Attorney Alice Murray has been admitted to practice both in Ohio and Florida and has 15 years' experience. She is certified as a specialist in appellate practice by the Florida Bar. Ms. Murray also provides legal services in connection with bankruptcies and guardianship cases. Located at 3 Clifford Drive, Shalimar, Florida. Our telephone number is (850) 651-1111 and our facsimile number is (850) 651-3210.

Attorney Siegfried F. Kessler

Located at 5 Clifford Drive, Shalimar, Florida. Our telephone number is (850) 651-9400.

Attorney Stephen S. Poche

Located at 1270 N Eglin Parkway C-10 PO Box 130, Shalimar, Florida. Our telephone number is (850) 651-4466.

Bank of America

Located on N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 729-4304.

Billing and Bookkeeping Services

Located at 1270 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 609-1195.

Bit-Wizards IT Solutions, Inc. (Photo)

Bit-Wizards IT Solutions is a cutting edge technology company that provides Professional Software Engineering, E-Commerce, Wireless, Web, and Information Technology Solutions. Bit-Wizards can satisfy your Computer & Software Engineering outsourcing/services needs. Bit-Wizards develops high-tech applications for the Microsoft Windows Family of Operating Systems, Wireless/Pocket PC, Internet /Intranet, and Multi-Tiered Distributed Architectures. Our expertise includes: .NET, MFC, COM+, DCOM, ATL, VB, SQL Server, Access, Oracle, C++, MTS, MSMQ, ASP, HTML, WinCE, Java, IIS, and Office customization. Our technical staff is organized and dedicated to meet each customer's feature set, schedule, and budget. We provide an environment where software professionals can create, thrive, and grow professionally. This allows our engineers to be creative and innovative in fulfilling each customer's needs. Our address is 1178 North Eglin Pkwy, in Live Oak Commons; Shalimar, FL 32579 and our phone number is (850) 651-2165 X1. You can also e-mail us or check out our website.

Brunson Marine

Located at 318 Calhoun Avenue, Destin, Florida. Our telephone number is (850) 651-8328.

The Cobb Law Firm

Our local address is 1255 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-6565.

Computer Help

Computer Help proudly boasts a 93% repeat rate. Here's what we provide:

Sales, service and support

Staffed by Engineers with Master's Degrees

On-site support

24 hour Emergency support

Experience in many industries

One-stop provider for all computing needs

Our services include:

Fix Computers

Install Cabling

Install Networks

Setup Servers

Troubleshoot Programs

Teaching

Web Sites

Product line over 70,000 hardware, software and computers

New Construction or Remodeling

Maintenance

Help you with your computer problems!!

We are looking forward to helping you. Please call ((850) 651-0341), fax ((850) 651-9398), [click here](#) or e-mail us at sales or support or visit our web site.

Computer Science & Application (Photo)

Located at 2 Clifford Drive, Shalimar, Florida. Our telephone number is (850) 651-4991.

Designs & Accessories by PT (Photo)

Located at 1104 N Eglin Parkway, Shalimar, Florida. For questions, comments, or information, our phone number is (850) 651-3324 or visit our web site.

Donna Riehl Investigations

Located at 7 Plew Ave, Shalimar, Florida. Our telephone number is (850) 651-1910.

Dr George B. Dorris Jr DDS PA

Located at 1115 N Eglin Parkway PO Box 894, Shalimar, Florida. Our telephone number is (850) 651-1125.

Dr David J. Hanle DMD

Located at 1115 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-2199.

Emerald Coast Driving Improvement School

Located at 1270 N Eglin Parkway C-10, Shalimar, Florida. Our telephone number is (850) 651-6436.

EquiPrime Mortgage

EquiPrime Mortgage is an affiliate of First Federal Bank and we have 16 branches throughout the Southeast. We are a full-service, licensed mortgage lender, offering all types of financing for any purpose. Second mortgages are available for debt consolidation, home improvement, education or cash needed for other reasons. Our first mortgage programs include VA, FHA, and Conventional, but we also provide loans to

those with credit difficulties and unique situations. Examples of these programs include: No-income verification, 125% Equity loans, recent bankruptcy, manufactured homes, condominiums and investment properties. We strive to provide the best possible service with quick approvals and easy closings. EquiPrime is conveniently located at 1270 N. Eglin Parkway, Suite C-11, Shalimar, Fl 32579. You may reach us locally at 609-0922 or toll-free at 1-800-909-7780. Visit our web site.

Excalibur Auto Exchange Inc.

Located at 1270 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-5450. Visit our web site.

Felix Beukenkamp Builder, Inc

Our mailing address is PO Box 655, Shalimar, Florida. Our telephone number is (850) 651-8673.

First Command Financial Planning

Our local address is 1120 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-8963.

Guisseppe's Wharf Restaurant

Located at 11 North Eglin Parkway, Shalimar, Florida.

Gulf Coast Auto Wholesale

Located at 1103 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-1132.

Haverty's Furniture

Located at 1175 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-0101.

Humana

Located at 1248 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 609-7950.

J.R. Anglea Realty

Located at 5 Clifford Drive Suite 5, Shalimar, Florida. Our telephone number is (850) 651-8776.

Kathy M. Jones - House Cleaning

Local telephone number is (850) 651-1249.

Metabolic Research Center

Located at 1270 N. Eglin Parkway Suite 17-A, Shalimar, Florida. Our telephone number is (850)609-3875.

MetLife Financial Services

Located at 1270 N. Eglin Parkway Suite A-11, Shalimar, Florida. Our telephone number is (850)651-1300 X37, e-mail us or visit our web site.

Nichols Research Corporation

Located at 1130 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-1199.

Nugget Oil Store #52

Located at 1198 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-1962.

Oral & Maxillofacial Surgery

Located at 7 Clifford Drive, Shalimar, Florida. Our telephone number is (850) 651-6882.

Paddy Prints

Our telephone number is (850) 651-3583.

Persist, Inc

Local telephone number is (850) 651-3327.

Phillips Consulting

Phillips Consulting is an independent consulting practice that provides specialized consulting services to small and medium-sized manufacturing firms; industrial collaborative networks; and technology transfer organizations. The services include industrial marketing and management, proposal preparation, and technical training for manufacturing firms; strategic planning, business development and marketing strategy for industrial collaborative networks; and the implementation of new technologies, target and broadcast marketing in support of public Research and Development Centers to facilitate the commercialization and transfer of technologies developed in their laboratories. Our mailing address is P.O. Box 1046; Shalimar, FL 32579-5046. Please feel free to phone or fax us at (850) 651-5567.

PKs Pub

Local at 1259 Eglin Parkway. Our telephone number is (850) 651-8281.

Quality Reel Repair

Located with Shalimar Yacht Basin Marina, Shalimar, Florida. Our telephone number is (850) 651-2991.

R. Sturgill Seminars

Local telephone number is (850) 651-2325.

Racetrac Petroleum

Located at 1183 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 609-8015.

Raymond James Financial Services, Inc

Asset/Cash Management - Banking Services - Certificates of Deposit - Fee Based Accounts - Insurance Annuities - Investment Banking - Mutual Funds - Retirement Plans - Stocks/Bonds - Trust Services/Estate Planning. We are a member of NASD/SIPC. Our address is 3 Plew Avenue, Shalimar, Fl, and our telephone number is (850) 651-1400.

Sabre Services International, LLC

Located at 5 Clifford Drive Suite 4, Shalimar, Florida. Our telephone number is (850) 609-8055.

Science Application International

Our local address is 1130 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-8385.

The Shalimar Cheers Pub

The Shalimar Cheers Pub is a longtime establishment of Shalimar known for its good food and friendly small town atmosphere. Cheers Pub is located behind ERA Realty directly across from Burger King on Eglin Parkway. The owners and operators would like to invite you to come enjoy their menu consisting of great sandwiches, hamburgers, and salads prepared by the best cook in Shalimar. Enjoy the pool tables, darts and big screen TV. Cheers serves ice cold longnecks and frozen mugs of your favorite beer. The Shalimar Cheers Pub is the closest eating/drinking establishment to Eglin's main gate and is open from 10am until 2am, Monday thru Saturday and noon until midnight on Sunday. Special parties can be arranged inside or out. The Cheers staff look forward to serving you soon. The local address is 1270 N. Eglin Pkwy, Shalimar, Fl and the telephone number is (850) 651-2740.

Shalimar Yacht Basin Marina

The Shalimar Yacht Basin provides a full service Marina to meet your boating needs for service, supplies and storage. The Marina offers a safe and secure natural harbor. Enjoy the relaxing bayou setting with all the amenities of home. Expect a pleasant, professional and friendly atmosphere. The Marina is located at the corner of Old Ferry Road and Gardner Drive, Shalimar, Florida. You may reach us locally at (850) 651-0510 or visit our web site.

Shell Food Mart #309 - Herndon Oil (Photo)

Located at the corner of Eglin Parkway and Cherokee Road. Our local address is 1101 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-3386.

Sonic Drive-in Restaurant

Our local address is 1166 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-6679.

Spiffy Wash and Lube

Our local address is 1266 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-0069.

Spiffy Window Tint

Our local address is 1266 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-0069.

Suncoast Scientific

Our local address is 998 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-6400.

Susan G. Maranon - Nail Technician

Local telephone number is (850) 651-3248.

Susanna M. Duke - Court Reporting

Local telephone number is (850) 651-8020.

Time Enhancer

Our local address is 7 Plew Ave, Shalimar, Florida. Our telephone number is (850) 651-1910.

Timesaver Oil & Lube

Our local address is 1111 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-5250.

Tom Fuqua Realty Inc

Our local address is 5 Clifford Drive Suite 7, Shalimar, Florida. Our telephone number is (850) 651-9696.

Universal Computer Center Inc

Our local address is 1 Clifford Drive, Shalimar, Florida. Our telephone number is (850) 651-9644.

USPA & IRA

Our local address is 1120 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-8963.

Victors IT Services

Local telephone number is (850) 803-3249.

Virtuous Soap

Our telephone number is (850) 651-2568.

Waffle House #282

Our local address is 1105 N Eglin Parkway, Shalimar, Florida. Our telephone number is (850) 651-4511.

7. The extent to which the specified community and the central city are part of the same advertising market:

Currently, there are no advertising media serving the special needs of Shalimar. The proposed station will, therefore, be a first advertising medium specifically serving the Shalimar market.

8. The extent to which the specified community relies upon the larger metropolitan area for various municipal services, such as police, fire protection, schools and libraries.

According to the Shalimar town website, Shalimar has its own municipal services including:

Police. *Shalimar Police Chief Charles Self and all of the Shalimar Police Officers are available as needed. The local telephone number is (850) 651-1115. 911 emergency services are available in Shalimar.*

The Shalimar Police Department will watch residents homes while they are out of town.

The Shalimar police department and the residents of Shalimar consider the entire Town a Neighborhood Watch area.

Educational Institutions

The Clifford Meigs Middle School

Shalimar Elementary School

Fire *Shalimar has its own fire station.*

Library *The independent Shalimar Library sits just outside the town's boundaries.*

Parks *There are two town parks - Cherokee Park and Clifford Meigs Neighborhood Park*

Further declarant sayeth not.

VICTOR C. BOSIGER

Dated: July 14, 2004

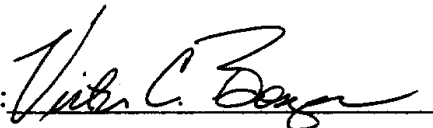
By: 

EXHIBIT A



STATE OF FLORIDA

)

:

ss.

COUNTY OF OKALOOSA

)

DECLARATION

Thomas Burns hereby declares under penalty of the laws of perjury that the following is true and correct:

1. I reside at 41 James Drive, Shalimar, Florida 32579. I have lived at that address for the past eleven years. It is slightly outside the incorporated boundaries of the community of Shalimar, but is in a neighborhood where residents identify themselves as living in Shalimar. For the past four years, I have served as the Town Manager of the incorporated community of Shalimar, Florida.

2. I make this Declaration in support of a petition filed with the Federal Communications Commission (hereinafter "FCC"), requesting that an FM Broadcast Channel be allotted to Shalimar. I support that petition on behalf of community residents.

3. I can assure the FCC that Shalimar residents have a strong sense of community identity. They know that they live in Shalimar; they do not think that they live in Fort Walton Beach or in any other community.

4. Furthermore, Shalimar is a net importer of jobs; *i.e.*, more people come to work in Shalimar each day than go to work from Shalimar to other communities. Therefore, I believe that Shalimar is not a typical "bedroom" community. It has an identity of its own, and it has needs and interests entirely separate and apart from those of the Fort Walton Beach urbanized area.

5. Detailed information concerning the Town of Shalimar can be found at our website www.shalimarflorida.org. In addition to the information posted on the website, there are five homeowners associations in Shalimar, and the Town Hall is used for Girl Scout meetings, women's voting league meetings (both Democratic and Republican), and Little League Baseball meetings. There is also a Boy Scout troop, associated with a church, which meets on the outskirts of Shalimar.

Further declarant sayeth not.

THOMAS BURNS

Dated: 7/08/04

By: Thomas A. Burns